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11 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

12 TERESITA GAETOS, an individual,

13 Plaintiff,

14 vs.

15 AMBIENT EDGE, LLC, a Delaware limited
 16 liability company; FRIENDLY HOME
 17 SERVICES GROUP, LLC, a Texas limited
 18 liability company,

19 Defendants.

20 Case No.: 2:24-cv-02380-APG-DJA

21 **STIPULATED DISCOVERY PLAN AND**
SCHEDULING ORDER

22 **SUBMITTED IN COMPLIANCE WITH**
LR 26-1(b)

23 Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's minute order from March
 24 26, 2025 [ECF No.15], Plaintiff Teresita Gaetos ("Plaintiff"), by and through her counsel of record
 25 , Greenberg Gross LLP, and Defendants Ambient Edge, LLC and Friendly Home Services Group,
 26 LLC ("Defendants"), by and through their counsel of record, Jackson Lewis P.C. hereby stipulate to
 27 the following Joint Proposed Discovery Plan and Scheduling Order:

28 1. **Initial Disclosures:** The parties participated in the scheduling conference pursuant
 29 to Fed. R. Civ. P. 26(f) on **March 19, 2025**. The parties shall exchange initial disclosures pursuant
 30 to Fed. R. Civ. P. 26(a)(1) no later than twenty-one (23) days after the Rule 26(f) conference, which

1 will be **April 11, 2025**. Initial Disclosures would normally be due fourteen (14) days after the
 2 Conference, but undersigned Defense Counsel will be in an arbitration hearing through April 3,
 3 2025; thus, the parties agreed to the April 11 deadline. Aside from timing, the parties do not believe
 4 that any changes are necessary as to the form or requirement of disclosures under Fed. R. Civ. P.
 5 26(a).

6 2. **Discovery Cut-Off Date(s)**: The last day of discovery shall be **September 8, 2025**,
 7 which is 181 days (as the 180th day falls on Sunday, September 7, 2025, a non-judicial day) from the
 8 date Defendants filed their respective Answers to Plaintiff's Complaint, **March 11, 2025**.

9 3. **Amending the Pleadings and Adding Parties**: The parties shall have until **June
 10 10, 2025**, which is ninety (90) days before the discovery cut-off date.

11 4. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts)**: The disclosure of any initial expert
 12 witnesses shall be made by **July 10, 2025**, which is sixty (60) days before the discovery deadline.
 13 The disclosures of any rebuttal experts shall be made by **August 10, 2025**, which is thirty-one (32)
 14 days (as the 30th day falls on Saturday, August, 9, 2025, a non-judicial day) before the discovery
 15 deadline.

16 5. **Dispositive Motions**: Dispositive motions may be filed no later than **October 8,
 17 2025**, which is thirty (30) days after the discovery deadline. In the event that the discovery period
 18 is extended from the discovery cut-off date set forth in this Joint Discovery Plan and Scheduling
 19 Order, the date for filing dispositive motions shall be extended for the same duration, to be no later
 20 than thirty (30) days after the discovery cut-off date.

21 6. **Pretrial Order**: If no dispositive motions are filed, the Joint Pretrial Order shall be
 22 filed by **November 7, 2025**, which is thirty (30) days after the deadline for filing dispositive
 23 motions. In the event dispositive motions are filed, the date for filing the joint pretrial order shall
 24 be suspended until thirty (30) days after the decision of the dispositive motions or until further order
 25 of the Court.

26 7. **Fed. R. Civ. P. 26(a)(3) Disclosures**: The disclosures required by Fed. R. Civ. P.
 27 26(a)(3), and any objections thereto, shall be included in the pretrial order. Extensions or
 28 Modifications of the Discovery Plan and Scheduling Order: In accordance with Local Rule 26-4, a

1 stipulation or motion for modification or extension of this discovery plan and scheduling order and
2 any deadline contained herein, must be made not later than twenty-one (21) days before the subject
3 deadline.

4 8. **Electronic Filing and Service:** The Parties attorneys of record in this matter are
5 registered users with the Court's electronic filing system and as such, consent to electronic service
6 of all documents and things electronically filed with the Court, except for pleadings and other
7 documents set forth in Fed. R. Civ. P. 4. For documents and things that are not filed with the Court,
8 the parties, in accordance with Fed. R. Civ. P. 5(b)(2)(F), each consent to electronic service of the
9 same as follows: for Plaintiff, service shall be made by email to JDunn@ggtriallaw.com;
10 MBurnette@ggtriallaw.com, and AMaciels@ggtriallaw.com, and for Defendants, service shall be
11 made by email to deverie.christensen@jacksonlewis.com, thomas.maroney@jacksonlewis.com,
12 and kelley.chandler@jacksonlewis.com.

13 9. **Electronically Stored Information:** The parties do not at this time anticipate any
14 issues regarding disclosures, discovery or preservation of electronically stored information ("ESI"),
15 if any, including the form or forms in which it should be produced. The parties anticipate that
16 evidence will be presented to jurors at trial in electronic format. As such, the parties will endeavor
17 to produce all documents in a format compatible with the Court's electronic jury evidence display
18 system. The parties agree that ESI can be produced or presented at trial in a readable image (e.g.,
19 .pdf or .tiff) file, while reserving the right to thereafter seek production of the ESI in native format
20 if necessary and to the extent readable images are insufficient in establishing any claims or defenses.
21 If a party later requests the ESI be produced in its native format and/or as a forensic copy, the parties
22 agree to meet and confer to determine the parameters of the production and to produce according
23 to the Federal Rules of Civil Procedure. The parties shall work in good faith with respect to the
24 production and presentation of ESI at trial.

25 10. **Privileged or Protected Documents:** The parties agree to be bound by Fed. R.
26 Evid. 502 regarding the disclosure of privileged material or work product. Further, the parties
27 acknowledge and agree that while each is taking reasonable steps to identify and prevent disclosure
28 of any document which they believe is privileged, there is a possibility that certain privileged

1 material may be produced inadvertently. Accordingly, the Parties agree that a party who produces
 2 a document protected from disclosure by the attorney-client privilege, attorney work product
 3 doctrine or any other recognized privilege ("privileged document") without intending to waive the
 4 claim of privilege associated with such document may promptly notify the requesting party that
 5 such document was inadvertently produced and should have been withheld. Once the producing
 6 party provides such notice to the requesting party, the requesting party must promptly return the
 7 specified document(s) and any copies thereof. By complying with this obligation, the requesting
 8 party does not waive any right to challenge the assertion of privilege.

9 11. **Alternative Dispute Resolution:** In compliance with Local Rule 26-1(b)(7), the
 10 parties certify that they met and conferred about the possibility of using alternative dispute
 11 resolution processes, but no agreement has been reached. The parties will continue to evaluate
 12 opportunities for alternative dispute resolution.

13 12. **Alternative Forms of Case Disposition:** In compliance with 28 U.S.C. § 636(c)
 14 and Local Rule 26-1(b)(8), the parties have considered consenting to the assigned Magistrate Judge
 15 Albregts, as well as the Short Trial Program, but do not consent to trial by the magistrate judge or
 16 to the use of the Short Trial Program at this time.

17 Dated this 2nd day of April, 2025.

18 */s/ Michael A. Burnette* _____
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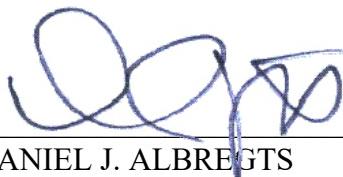
23
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 28 *Attorneys for Defendants*

1 **IT IS SO ORDERED** that the parties' stipulated discovery plan and scheduling order
2 (ECF No. 18) is GRANTED.

3 DATED this 3rd day of April, 2025.

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5 DANIEL J. ALBREGTS
6 UNITED STATES MAGISTRATE JUDGE

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